

COMMENTS OF GREATER MEDIA, INC.

A. INTRODUCTION

Greater Media, Inc., through subsidiary licensees, has been a broadcast licensee for 40 years, operating both AM and FM stations in communities large and small across the United States. Today, Greater Media operates a total of 19 AM and FM stations in Boston, Massachusetts; Philadelphia, Pennsylvania; Detroit, Michigan; and several communities in New Jersey. Each of Greater Media's radio stations is dedicated to local management, programming, and public interest activities. We strive to provide programming that is responsive to the unique interests and needs of the communities to which our stations are licensed. We believe this is the greatest strength and promise of terrestrial radio.

Under these circumstances, Greater Media is well qualified to comment on broadcast localism. Greater Media has dedicated itself over the past 40 years to the advancement of local causes, and the preservation of the local character and commitment of broadcast radio. Greater Media's comments below address specific issues raised in the Commission's Notice of Inquiry.

B. COMMUNITY PROGRAMMING AND PUBLIC AFFAIRS

Greater Media has found that through a combination of self-designed ascertainment procedures, listener and community outreach, and an open line of communication with our listeners, our stations are well-informed about the interests and concerns of the communities we serve. Responding to these interests and concerns is a critical component in attracting and maintaining a loyal listener base, which is in turn critical to our success in generating advertising revenue.

Greater Media's stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities. First, the stations regularly solicit input from listeners regarding issues of interest and importance to the community, both through on-air announcements and on the station websites. Listener suggestions are communicated by e-mail, regular mail, and phone. (E-mail received from listeners is answered by the stations' program directors whenever possible, while direct e-mail to on-air personalities is answered by the specific addressee. Any e-mail relating to a station's operations is duly forwarded to the station's public file.) Second, many of the stations conduct regular polls and research on their websites, including seeking listener opinions about news and public affairs programming and events. Third, many stations invite community leaders to suggest topics of importance to their constituents, or ask station members to participate in local community organizations such as local Chambers of Commerce to get a better idea of local concerns. In addition, station management and on-air personnel regularly monitor a number of news sources for topics of importance and for breaking news. For example, at station WJRZ in Manahawkin, New Jersey, the news department creates a weekly datebook of local newspaper clippings and faxes from civic and charitable organization to determine the types of interviews and programs that it will air.

Each of our stations broadcasts daily programming that provides current news, weather, and traffic information. This information is obtained from local and national services, as well as in-house monitoring of major news sources, and is delivered by local on-air personnel. News and weather updates generally are broadcast every half-hour during prime morning drive hours, ranging from 20-35 reports per station per week. Many stations include afternoon updates, stock reports, and breaking news. News reports offer listeners up-to-the-minute information on local, national and international events, and also focus on issues of concern to our listeners, including the economy, environment, health, and lifestyle. Each report is live, delivered with the latest weather forecast and current weather conditions. News reports also include information on sports events of interest to the local community. Our investment in this type of news reporting is substantial: in Detroit, for example, local news reporting for three stations has an annual value of over \$500,000.

Our traffic reports provide listeners with the latest information on accidents, road hazards and slowdowns, and offer alternative routes around problem areas. Each report covers major transportation routes in and around the metropolitan area and, if applicable, also covers routes used for interstate travel between adjacent states. Traffic reports occur frequently during the peak morning drive hours and occasionally during afternoon drive as needed.

Our news/talk stations broadcast continuous programming designed to inform and provoke thought among our listeners, including talk shows featuring local personalities such as Margery Egan, Jim Braude and Mike Barnicle in Boston (WTKK), and Jay Sorenson and Jack Ellery in Central New Jersey (WCTC-AM).

In addition, each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Although the majority of our public affairs programming is produced locally in the station's community, we find that our listeners have many interests and concerns that are more universal. For this reason, our public affairs programming includes nationally syndicated programs that address specific issues of concern to our audience, such as women's health, parenting, and financial planning. We believe these programs provide important and current information that may not otherwise be readily available to our listeners. Examples of Greater Media's public affairs programming include:

- WMJX, licensed to Boston, Massachusetts, airs two locally-produced public affairs programs each week. *Boston Life*, a 30-minute show hosted by WMJX news director Gay Vernon, comprises long-form interviews with local community and political leaders. *Exceptional Women*, a 30-minute show hosted by Ms. Vernon and WMJX's assistant program director Candy O'Terry, includes long-form interviews with local and non-local women whose accomplishments are an inspiration to WMJX listeners.
- WBOS, licensed to Brookline, Massachusetts, maintains a strong commitment to community issues and concerns through its radio program *Greater Boston Today*, a locally originated public service program that airs weekly. WBOS actively seeks listener input regarding issues raised during *Greater Boston Today*, and also solicits listener's comments, concerns and critiques with on-air announcements and during station events. WBOS uses listener input, along with monitoring of local and regional newspapers and

TV and radio broadcasts, to identify local issues and concerns. WBOS contacts community religious and political leaders in Brookline by mail to specifically seek their input regarding issues of importance to the community. WBOS also airs *The Parent's Journal*, a 30-minute weekly program devoted to issues about raising children in a healthy, supportive environment.

- WMGC, licensed to Detroit, Michigan, airs four weekly public affairs programs, including:
 - *Ask the Professor*, a 30-minute program produced by the University of Detroit Communications Department, consists of a rotating panel of University professors answering questions submitted by the radio audience via mail. Each show addresses numerous Detroit community concerns including the economy, the environment, race relations, media, health, science, business and labor.
 - *CounterSpin*, a 30-minute program produced by Fairness and Accuracy in Reporting (FAIR), provides WMGC listeners with an analysis of how the news is presented. Guests discuss media bias, whether based on race, class, gender or other factors, which deters from the objective presentation of news about current events and contemporary topics.
 - *The Peter Werbe Show*, a one-hour program written, produced and hosted by Greater Media Detroit's Public Affairs Director, expressly addresses issues of public concern as determined by our ongoing process of ascertainment. Each week, Mr. Werbe interviews community leaders, experts in a variety of fields, authors, government officials, media personalities, charity and volunteer workers, and people working in various organizations to improve community and political life. These interviews also serve as part of the process for collecting the views of the guests for future shows.
 - *Living For You*, a 30-minute program that explores issues surrounding women's physical, mental and emotional health. The host, Mary Rahmann, shares her vast knowledge with the audience, and also talks with many health leaders, authors and experts to keep women up to date on these issues. (Women comprise the majority of WMGC's audience.)

Our stations also include regular programming features designed to inform their listeners about local events of interest. For example, on WMWX in Philadelphia, the station broadcasts The Weekend Update each Friday, providing a list of local events including fundraisers, charity walks, and other events happening within the community that might be of interest to our listeners. WMWX also conducts frequent on-air interviews with local personalities on topics such as health, safety, and charitable events, including:

- Liz and Jay Scott - the Wynnwood, Pennsylvania parents of Alex Scott, a young girl diagnosed with cancer who started a lemonade stand to raise money for cancer research. Alex's efforts led to the creation of lemonade stands across the country which eventually

raised close to a million dollars. WMWX hosted Alex's parents twice to promote a lemonade stand event.

- A doctor from the University of Pennsylvania regarding new findings in breast cancer research.
- Two representatives from The Crohns and Colitis foundation discussing "Sippin' By The River," an event to raise money for Crohns and colitis research.
- Anita Brickman, Chairperson for The Walk against Breast Cancer and a Health reporter for ABC's Channel 6, urging listeners to participate in the Walk.
- Amy Freeze, a weather reporter for NBC10, discussing incoming hurricanes and the steps to take to prevent damage.

Station WJRZ in New Jersey airs three to five local public affairs interviews per week, approximately four to five minutes in length, on weekday mornings at 7:40 or 8:40. Recent topics included detecting and preventing skin cancer, Jackson and Brick Township's "Night out against Crime," the American Red Cross "Rock and Ride Bike Tour" on Long Beach Island, and the Ocean County Health Department's "Pretty in Pink" Day in support of the fight against Breast Cancer.

The morning show on WROR in Boston frequently broadcasts information and announcements about local museum openings, special events and engagements at local cultural centers, area fairs, theatre events, and fire and police outreach programs. These events are also frequently featured in station PSAs if they are charitable in nature.

Our stations air hundreds of public service announcements (PSAs) each week. For example, WJRZ airs approximately 20 different PSAs each week in equal rotation, once per hour in morning drive and once per daypart during the rest of the day. PSAs are chosen from faxes and mail received from the community as a result of daily on-air solicitation. PSA topics include health screenings, blood drives, and community fund raising. The announcements are also posted on the station website. WROR (Boston) airs at least one PSA per shift per daypart, 24 hours a day. WPEN-AM (Philadelphia) airs 30-second PSAs daily on a run-of-schedule basis. Stations also broadcast PSAs on general topics, such as WROR's promotion of free mammogram clinics during National Breast Cancer Awareness Month, and provision of information about food and blood drives for victims of natural disasters. The WMWX Morning Show also discussed and supported several events during Breast Cancer Awareness Month in October. The morning newscaster on WRAT (New Jersey) promotes a local charitable or community event before each newscast, for approximately five live mentions per day, five times per week. Topics include local blood drives, food collections, benefits for those with serious or life threatening ailments, and voter registration campaigns. All items are also included on the WRAT website's "PSA Page".

Greater Media stations air promotional announcements and live broadcasts from numerous civic and fundraising events, such as local fairs and charity races. WROR (Boston)

has established an annual tradition of broadcasting the morning show live from a local firehouse during the week before Thanksgiving. Each year, WROR coordinates with local sponsors to donate a product or service the firehouse needs, including new ovens, furniture, or a gift certificate for building products. In July 2004, following devastating floods that affected several residential areas in New Jersey that are a part of the WMGK listening area, afternoon drive host Andre Gardner broadcast live from Marlton, New Jersey, and raised over \$7,000 for flood victims. This November, John DeBella and WMGK will again hold the annual Turkey Drop, broadcasting live from community locations and collecting turkeys to be donated to City Team Ministries to help feed the homeless and needy in Philadelphia at Thanksgiving.

Some of our stations broadcast “radiothons” to promote and raise funds for local non-profit organizations, such as the WPEN (Philadelphia) radiothon to benefit the non-profit Philadelphia Corporation for Aging, an organization that supports seniors in the Philadelphia area; and the WCSX (Detroit) radiothon to benefit the Children’s Leukemia Foundation of Michigan. For the last four years, WRAT in New Jersey has conducted the “Broadcast for the People of New Jersey,” a charity drive during which the station conducts a live broadcast starting at 6 a.m. from a 44-foot tractor trailer parked outside a sponsor location. The broadcast continues until the truck is filled with used clothing for the Family Resource Associates, non-perishable food items for the Monmouth Ocean Food Bank, and stocking stuffer items for the Holiday Express. Each year, the truck is filled within two days.

Other stations feature special programming with similar civic and charitable goals. For example, WROR broadcasts an annual "Salute the Troops" weekend, during which local listeners call with well-wishes for their loved ones serving in the military overseas. WROR records these messages and sends them to the listeners so they can share them with the soldiers. WROR also enjoyed a partnership with Red Sox pitcher Curt Schilling during the 2004 baseball season, in which Mr. Schilling was a weekly call-in guest to the WROR morning show, offering his insights on baseball and promoting his fight against ALS (Lou Gehrig’s disease). WROR’s partnership with Curt Schilling raised approximately \$115,000 this year for the ALS Association. WMMR in Philadelphia broadcast a two-hour special on September 11, 2004 honoring the memory of those private and public workers killed in the attacks of September 11, 2001. The program was a historical retrospective on the events of that day, including the importance and impact of volunteering time and resources to charities and causes of all kinds. On September 26, 2004, WMMR aired a two-hour broadcast highlighting on-air personality Pierre Robert’s interview with Bono of U2 during the Philadelphia Rally to Fight Global AIDS & Poverty, which occurred Sunday, May 16, 2004. The rally consisted of a diverse coalition of partner groups, including Bono’s DATA (Debt AIDS Trade Africa), committed to fighting AIDS & poverty in Africa and around the world. At the conclusion of the Rally, Mr. Robert interviewed Bono and ran pieces from the interview all week, as well as Bono’s entire speech from the rally.

We also use our websites to promote local events and charitable causes. For example, WMWX in Philadelphia posts the Mix 95.7 Community Event Calendar, and is currently hosting the Charlie Maxx “Bosom Buddies” Breast Cancer Awareness Resource page, where visitors to the website can learn more about the organization and make donations. The WROR (Boston) website offers links to numerous local charities, including a section on the website called “Community Forum,” which highlights a Charity of the Month. This month, WROR is

promoting Respond, Inc., a non-profit organization dedicated to helping women and their children create options for a safer life, free from domestic violence, and to furthering the efforts of the larger community to end domestic violence. WRAT-FM in Pt. Pleasant, New Jersey, includes a PSA page on its website listing all community events for which the station has received information. WMMR in Philadelphia includes a community events page on its website that lists about six charitable events per week.

Our stations also broadcast local non-professional sporting events, such as Rutgers football games (WCTC-AM in New Brunswick) and St. Joseph's basketball games (WPEN-AM in Philadelphia). WRAT (New Jersey) broadcasts live from select Lakewood Blueclaws baseball games, including inviting representatives from the team to appear on the morning show. The station also makes donations to high school teams when requested for fund raisers they conduct. We are glad to have the opportunity to provide this type of local programming and local involvement to our listeners, who otherwise would not be able to follow their local teams in real time.

C. POLITICAL PROGRAMMING

Greater Media's radio stations, particularly its news/talk stations, are devoted to promoting political and civic discourse in their respective communities. Our music stations intentionally attempt to provide non-partisan political programming. Examples of our political programming include:

- WTKK-FM, licensed to Boston, Massachusetts, provided extensive daily coverage of the 2004 Democratic National Convention in Boston, as well as the 2004 Republican National Convention in New York.
- Over the past several weeks, many of our stations have been airing non-partisan live announcements by on-air personalities encouraging listeners to vote in the upcoming election, and directing listeners to phone numbers and websites to obtain polling locations, registration deadlines, and other pertinent information.
- Our station WMGC-FM in Detroit invited the Kerry and Bush campaigns to participate in a town hall meeting, to be broadcast live from Wyandotte, Michigan, to discuss issues of concern to women. Unfortunately, the president and his surrogates declined to participate, so the event was cancelled.
- The morning show on WRIF, licensed to Detroit, Michigan, frequently discusses local news topics, such as the potential indictment of a city councilwoman and an investigation into the Detroit police department. The morning show hosts offer commentary on these events and share listener opinions on-air.
- The Frank Rizzo Show on WPEN-AM in Philadelphia features Philadelphia City Councilman Frank Rizzo, who typically invites political guests from both sides of the aisle onto his show to discuss current topics of interest.

- On October 1, 2004, WMMR (Philadelphia) broadcast a five-hour special from the Vote For Change concert being held at the Wachovia Center in Philadelphia. While the artist focus at the concert was pro-Democrat, WMMR's coverage on the air stressed the importance of registering to vote and voting, no matter which side the listeners support.

D. EMERGENCY PROGRAMMING

All of our stations are equipped for EAS broadcasts, although we welcome further discussion on this topic. All of our stations participate in local "Amber Alerts" to assist local authorities in locating missing children. Regular programming is interrupted to broadcast these alerts.

In addition, our stations respond to local emergencies as required or appropriate under the circumstances. For example, during the 2003 power outage in much of the Midwestern United States, our three Detroit stations switched from their music formats to provide constant information and guidance for listeners affected by the power failure. After the attacks of September 11th, these same stations discontinued regularly scheduled programming to provide information and commentary from the on-air personalities, and invite on-air dialogue with the listening audience. It is our belief that this responsiveness to local and national events provides a great service and a level of comfort and community for our listeners.

In New Jersey, our station WJRZ provides school closing information during inclement weather for Ocean and Monmouth counties, with updates every 15 minutes as needed, and similar information posted on the station website. WJRZ also employs a full time local meteorologist. WRAT, also in New Jersey, is the only fully staffed, 24 hours a day radio station in Monmouth and Ocean counties. For this reason, the local nuclear power plant, the Oyster Creek facility, has WRAT as its first contact in case of an emergency, and other local radio and television stations monitor WRAT for this information. WRAT routinely participates in local drills and tests of the Oyster Creek emergency system.

On a more technical note, our station WMGK in Philadelphia is the local primary (LP)-2 station for the EAS Philadelphia Extended Operational Area (PEOA). All other broadcast and cable systems in the operational area must monitor WMGK for EAS purposes. WPEN also served as an LP station through May 2004, when a re-write of the State EAS Plan reduced the number of LP stations in an operational area to two. (WJRZ in Manahawkin, New Jersey, also serves as a local primary station.)

Each of our Philadelphia stations (WMGK, WPEN, WMMR, WMWX) rebroadcasts EAS "Amber" Child Abduction Emergency messages and has also elected, as a matter of policy, to relay a number of optional EAS messages pertaining to the local EAS operational area, including Civil Danger Warnings, Civil Emergency Messages, Earthquake Warnings, Immediate Evacuation messages, Fire Warnings, Hazardous Materials Warnings, Local Area Emergencies, Law Enforcement Warnings, Nuclear Power Plant Warnings, Radiological Hazard Warnings, Shelter in Place Warnings, and 911 Telephone Outage Emergencies.

Our Chief Engineer in Philadelphia, Larry Paulausky, serves both as the chairperson of the Local Emergency Communication Committee (LECC), and as a member of the Pennsylvania State Emergency Communication Committee (SECC). As LECC chairman, Mr. Paulausky arranged an agreement in January 2004 between the two Philadelphia LP stations and the LP station serving listeners across the river in New Jersey (WKDN) that permits the Pennsylvania LP stations to monitor WKDN for EAS purposes, and to rebroadcast certain EAS alert messages which originate in New Jersey and which are intended for New Jersey residents of Camden, Burlington and Gloucester counties. Without this agreement, stations in Pennsylvania had no certain access to these messages, which meant in turn that New Jersey residents who happened to be tuned to Pennsylvania radio or television stations also lacked this access. This additional monitoring and commitment to broadcast emergency messages is far beyond the scope of the Commission's requirements, and yet represents a pivotal and important element in local emergency communications. Our stations are very proud of their leadership role in this regard.

E. CREATION AND SELECTION OF PROGRAMMING

Each of our stations conducts extensive local music testing to design and develop its playlists. We absolutely do not subscribe to any "national" playlists because we believe we have an obligation to play what our listeners want to hear.

For example, in Detroit, the stations perform an annual comprehensive review of all aspects of station programming using a strategic telephone study. Additional music tests are fielded three to four times per year. We also hold "listener advisory board" meetings at least once per quarter, during which volunteers from the station listener database are invited to the station to discuss programming, policy, advertising, and all other aspects of listener satisfaction.

Our stations also use their station websites as a source of communication with and feedback from listeners. For example, WROR in Boston regularly conducts polls and research via the website, including seeking comment on its news and public affairs programming and events. Our stations in Detroit are similarly polled on a regular basis regarding a variety of topics, including reception problems, program content, and charitable projects. WRAT in New Jersey gathers programming suggestions from the community via the "Contact Us" portion of the station website, which includes links to the promotions and marketing department and the programming department. Listener suggestions often translate to the airwaves in the form of requests and dedications or local PSAs.

Many of our stations broadcast regular programming that is designed to spotlight local artists or music outside the station's format. For example, our station WRIF in Detroit airs a weekly local music program on Sunday nights. Local bands are constantly invited to submit material for this program, and the station consistently gets a good response from local talent. WROR (Boston) has featured local artists including State Trooper Dam Clarke's Patriotic Songs, Entrain, a local rock band, and Gary Bagarella's Red Sox spirit song. WRAT in New Jersey features local music on a regular basis through a broadcast program called "Jersey Rock," which airs Monday through Thursday nights at 8:30 p.m. Listeners are encouraged to view the schedule of artists on a special dedicated page on the station website. Local music is accepted by compact disc submissions or MP3 submissions to the host of the program. Although it is a

“classic hits” station by format, Boston’s WROR regularly promotes “garage bands,” including a weekly broadcast of “Little Steven’s Underground Garage.” WBOS, also in Boston, airs “Blues on Sunday” every Sunday night from 9:00 p.m. to midnight. Two of our stations air a weekly “Over Easy” program featuring acoustic music and rarities. WMJX in Boston airs a Sunday morning jazz program, and also provides listeners access to a jazz sub-channel via the internet.

We believe that digital radio and the internet can provide many opportunities to broaden our programming offerings and serve a wider audience. Digital radio offers the potential to broadcast on subchannels, on which alternative programming could be aired. The internet provides limitless opportunities to stream alternative programming, although the current CARP rulings make web streaming somewhat cost-prohibitive, particularly for experimental formats.

F. COMMUNITY ACTIVITIES

Greater Media is a firm believer that our public interest obligations do not begin and end with our programming activities. Each of our stations is an active participant in its local community, particularly with respect to sponsoring local fundraisers and bringing attention to issues of local concern and importance. According to a recent NAB survey, terrestrial broadcasters donated \$9.6 billion in cash, goods and services to their local communities in 2003. Greater Media’s stations were no exception; we sponsored or participated in events that raised millions of dollars for local charities. For example:

- WMGK’s Rock Art Show in Philadelphia raised over \$250,000 for local AIDS research and related organizations. This is an annual event.
- WROR’s Bras for a Cause auction in Boston, which auctioned off celebrity bras designed by Goldie Hawn, Susan Sarandon, Pamela Anderson, Steven Tyler and local professional athletes, among others, raised \$30,000 in 2003 and \$25,000 in 2004 for local breast cancer research organizations.
- WCSX/JJ & Lynne’s Stone Soup Mustang raffle in Detroit raised \$100,000 for the Children’s Leukemia Fund of Michigan, and their all-day radiothon raised another \$250,000.
- On-air personality Andre Gardner’s 4-day vigil in an RV outside Lincoln Financial Field in Philadelphia leveraged Bruce Springsteen’s concerts and commitment to the homeless to raise \$17,000 and 11,000 meals for a local food bank, courtesy of WMGK.
- WJRZ participated in “Kops & Kids Nites” at a local Pizza Hut in Ocean County, New Jersey, with the station providing prizes, live entertainment, and live broadcasts, and all tips and donations going to the Stafford Municipal Alliance to help fund drug and alcohol awareness in local schools.
- Mix 95.7 WMWX sponsored a “Stuff the Bus” benefit with K-Mart stores in Philadelphia, which collected new school supplies for the Salvation Army to help local families in need.
- WMGQ-WCTC sponsored the first annual Red Cross Walk-a-Thon for local disaster relief in central New Jersey.

- The WMJX Exceptional Women and WMGC Women Who Make Magic awards ceremonies in Boston and Detroit honored women locally and around the country for their contributions and courage, and raised money for local cancer research and treatment.
- WRIF's morning show duo, Drew & Mike, have established a foundation to help the families of fallen police officers and firefighters in the Greater Detroit area. To date, the foundation has donated approximately \$100,000 to this cause.
- WMGK and its morning show host John DeBella hosted the 2nd Annual DeBella Dog Walk in Philadelphia. The "day in the park" outing drew over 1,000 people and promoted responsible pet ownership, as well as promoting local pet shelters and rescue organizations.
- Greater Media Boston's General Manager, Matt Mills, sits on the board of the Genesis Fund, a nonprofit organization that raises money for the specialized care and treatment of New England area children born with birth defects, mental retardation and genetic diseases. Station management personnel at Detroit's WCSX have served on the Board of the Children's Leukemia Foundation of Michigan.
- WMWX in Philadelphia participates in the Kid Care ID program, for which the station enrolls children in the program free of charge at select events. (A Polaroid photo of each child is placed in a jacket that contains vital information and statistics for the parents keep on file in case of an emergency.)
- WMWX also sponsors the Mix 95.7 Taking A Lead In The Community program, where WMWX honors one outstanding individual each month who has made significant and notable contributions for the betterment of the community. Each recipient is recognized in on-air promotional announcements and featured on the station website.
- WMMR in Philadelphia hosted an annual Hard Hat Games, during which housing supplies were donated to Habitat for Humanity.

In short, all of our stations participated in countless local food drives, benefit concerts, holiday toy drives and other charitable events that brightened the lives of the people we serve and provided resources to communities in need.

It is rewarding to know that Greater Media has the capacity to bring together local personalities and charitable causes to benefit our communities. Our radio stations are truly local businesses, and we are an integral part of the communities where we operate. We are proud of our ongoing commitment to localism and the endless generosity of our employees and listeners in giving back to their communities.

G. CONCLUSION

As demonstrated above, each of Greater Media's stations devotes a substantial portion of its air time, financial resources, and outreach efforts to (1) creating an ongoing dialogue with listeners and the general public and (2) using that dialogue to create programming and community events that serve the public interest and address the issues that are most important to

each community. Greater Media welcomes a continuing dialogue with the Commission and with the listening public regarding the public interest obligations of broadcasters. We take these obligations very seriously, and we are proud of the service we provide to the communities in which we are licensed.

However, we do not believe that additional policies, practices or rules will best serve to promote localism. In fact, we believe that imposing additional standards could be counterproductive by focusing broadcasters on rules instead of communities. We believe that the community service we and many other broadcasters provide is far in excess of anything that the Commission might require. Imposing new rules, particularly quantitative rules, could inadvertently result in broadcasters' tailoring their public service efforts to meet the minimum requirements, rather than actively (and in many cases, competitively) seeking out opportunities to make a difference in their communities.

The current structure, with a general but overarching public service obligation, a quarterly reporting requirement, and an incentive to seek frequent input from our listeners and advertisers, gives broadcasters the flexibility and motivation to engage with the public and promote localism on a number of levels. Flexibility allows broadcasters to use their greatest strengths – boundless creativity and widespread appeal – to benefit our listeners and the communities in which we operate and live. Not only can we use the airwaves to provide programming that informs and entertains, but we can use our relationships with celebrities and local businesses to create partnerships and events that attract attention and dollars for worthy causes. We can work with our listeners to adjust and improve our content to meet local expectations. In sum, the most effective way to ensure that broadcasters serve the public to the best of our ability is to permit and encourage station management to deploy station resources in a way that best complements the station's format, demographic, and relationships within the community.